

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
TACOMA DIVISION

AYLO PREMIUM LTD, a limited liability  
company organized under the laws of the  
Republic of Cyprus,

Plaintiff,

vs.

JOHN DOES 1 - 20 D/B/A, PORNX.P.COM,  
PORNX.P.NET, PORNX.P.CC, PORNX.P.ORG,  
PORNX.P.CLOUD, PORNX.P.EU,  
PORNX.P.CLICK, PORNX.P.PICS,  
PORNX.P.QUEST, PORNX.P.BUZZ,  
PORNX.P.CFD, PORNX.P.NETWORK,  
PORNX.P.PRO, PORNX.P.LIFE,  
PORNX.P.SBS, PORNX.P.STREAM,  
PORNX.P.ME, PORNX.P.CLUB,  
PORNX.P.ONE, PORNX.P.SPACE,  
PORNX.P.TV, PORNX.P.CAM,  
PORNX.P.LIVE, PORNX.P.TUBE,  
PORNX.P.TOP, PORNX.P.WATCH,  
PORNX.P.DOWNLOAD, PORNX.P.LOL,  
PORNX.P.LAT, PORNX.P.WEBSITE,  
PORNX.P.SITE, PORNX.P.ONLINE,  
PORNX.P.VIDEO, PORNX.P.XYZ, AND  
PORNX.P.INFO.

Defendants.

**Case No.: 3:25-cv-05473-BHS**

**DECLARATION OF SPENCER  
FREEMAN IN SUPPORT OF  
PLAINTIFF'S *EX PARTE* MOTION  
FOR EARLY DISCOVERY AND FOR  
AN EXTENSION OF THE SERVICE  
DEADLINE**

NOTE ON MOTION CALENDAR:  
JUNE 18, 2025

DECLARATION OF SPENCER FREEMAN IN  
SUPPORT OF PLAINTIFF'S *EX PARTE* MOTION FOR  
EARLY DISCOVERY  
Case No. 3:25-cv-05473

- 1

**FREEMAN LAW FIRM, INC.**  
1107 ½ Tacoma Avenue South  
Tacoma, WA 98042  
(253) 383-4500 - (253) 383-4501 (fax)

1 I, Spencer Freeman, under penalty of perjury, declare and state as follows:

2 1. I am an attorney at law licensed to practice before the Courts of the State of  
3 Washington, the United States District Court, Western District of Washington, the Eastern  
4 District of Washington, the Ninth Circuit Court of Appeals, and the United States Supreme  
5 Court. I am the principal attorney with the Freeman Law Firm, Inc., attorneys for Plaintiff Aylo  
6 Premium Ltd. Unless otherwise stated, I have personal knowledge of the facts contained herein  
7 in this declaration and, if called and sworn as a witness, could and would competently testify  
8 thereto.  
9

10 2. I have sent emails to the following vendors associated with Defendants' websites:  
11 (1) NameSilo LLC, (2) GoDaddy Operating Company LLC, and (3) Public Interest Registry. I  
12 asked each one if it would honor my request for information without a subpoena. None of the  
13 vendors responded.  
14

15 3. In previous litigation, I have had direct contact with the following regarding the  
16 production of information without a subpoena: NameSilo LLC, GoDaddy Operating Company  
17 LLC, Public Interest Registry, and PrivacyGuardian.org LLC. Each of these entities previously  
18 clearly indicated that they would comply with a subpoena seeking information about their  
19 customers who are accused of copyright infringement (and have done so), but that they would  
20 not produce any information without a subpoena.  
21

22 I declare under the penalty of perjury under the laws of the United States of America that  
23 the foregoing is true and correct.

24 Executed on the 18th day of June 2025 at Tacoma, Washington.

25 /s/ Spencer D. Freeman  
26 Spencer Freeman